1 MELINDA HAAG (CABN 13612) United States Attorney 1 THOMAS MOORE (ALBN 4305-078T) 3 Chief, Tax Division 1 Assistant United States Attorney 2 Assistant United States Attorney 3 (Chief, Tax Division 1 Attorneys for the United States of America 4 Minimum		
9 NORTHERN DISTRICT OF CALIFORNIA 10 SAN FRANCISCO DIVISION 11 UNITED STATES OF AMERICA and CHUNG NGO, Revenue Agent, 13 Petitioners, 14 Petitioners, 15 APPLICATION TO RESCHEDULE 16 HEARING ON ORDER TO SHOW 17 CAUSE AND CASE MANAGEMENT 18 ORDER 19 TAMARA L. HEFFELFINGER and 20 The United States respectfully requests that this Court reschedule the hearing of the Order to Show Cause and Case Management Conference, currently scheduled for January 27, 2011, at 10:00 a.m., to March 31, 2011, at 10:00 a.m. The parties have tentatively reached a settlement of the issues. Respectfully submitted, MELINDA HAAG United States Attorney Date: January 24, 2011 SAN FRANCISCO DIVISION No. CV 10-3817 MEJ APPLICATION TO RESCHEDULE HEARING ON ORDER TO SHOW CAUSE AND CASE MANAGEMENT CONFERENCE and [PROPOSED] Date: March 31, 2011 Time 10:00 a.m. Place Courtroom B, 15th Floor Place Courtroom B, 15th Floor The United States respectfully submitted, MELINDA HAAG United States Attorney Date: January 24, 2011 SAC Cynthia Stier CYNTHIA STIER Assistant United States Attorney	2 3 4 5 6	United States Attorney THOMAS MOORE (ALBN 4305-O78T) Assistant United States Attorney Chief, Tax Division CYNTHIA STIER (DCBN 423256) Assistant United States Attorney 9th Floor Federal Building 450 Golden Gate Avenue, Box 36055 San Francisco, California 94102 Telephone: (415) 436-7000
SAN FRANCISCO DIVISION 11 12 13 14 15 16 17 18 19 19 10 11 11 12 11 12 12 13 14 15 15 16 16 17 18 19 19 10 10 11 10 11 11 12 11 12 12 12 13 14 15 15 16 16 17 18 18 19 18 19 19 10 11 11 12 12 13 14 15 15 16 17 18 18 19 18 19 19 10 10 10 11 11 12 12 12 13 14 15 15 16 17 18 18 19 18 19 19 10 10 10 10 10 10 10 10 10 10 10 10 10	8	UNITED STATES DISTRICT COURT
11 UNITED STATES OF AMERICA and CHUNG NGO, Revenue Agent, 13 Petitioners, 14 V. 15 Petitioners, 16 STEVEN T. HEFFELFINGER and 17 Respondents. 18 The United States respectfully requests that this Court reschedule the hearing or the Order to Show Cause and Case Management Conference, currently scheduled for 20 January 27, 2011, at 10:00 a.m., to March 31, 2011, at 10:00 a.m. The parties have tentatively reached a settlement of the issues. Respectfully submitted, MELINDA HAAG United States Attorney Date: January 24, 2011 Respondents. No. CV 10-3817 MEJ No. CV 10-3818 MEJ APPLICATION TO RESCHEDULE HEARING ON ORDER TO SHOW CAUSE AND CASE MANAGEMENT CONFERENCE and (PROPOSED) ORDER Date: March 31, 2011 Time 10:00 a.m. Place Courtroom B, 15th Floor Respectfully scheduled for January 27, 2011, at 10:00 a.m. The parties have tentatively reached a settlement of the issues.	9	NORTHERN DISTRICT OF CALIFORNIA
UNITED STATES OF AMERICA and CHUNG NGO, Revenue Agent, Petitioners, P	10	SAN FRANCISCO DIVISION
12 UNITED STATES OF AMERICA and CHUNG NGO, Revenue Agent, 13 Petitioners, 14 Petitioners, 15 HEARING ON ORDER TO SHOW 16 CAUSE AND CASE MANAGEMENT 17 CONFERENCE and PROPOSED 18 ORDER 19 Tamara L. HEFFELFINGER and STEVEN T. HEFFELFINGER, 10 Date: March 31, 2011 Time 10:00 a.m. Place Courtroom B, 15th Floor 18 Place Courtroom B, 15th Floor 19 The United States respectfully requests that this Court reschedule the hearing or the Order to Show Cause and Case Management Conference, currently scheduled for January 27, 2011, at 10:00 a.m., to March 31, 2011, at 10:00 a.m. The parties have tentatively reached a settlement of the issues. 20 Respectfully submitted, MELINDA HAAG United States Attorney Date: January 24, 2011 APPLICATION TO RESCHEDULE HEARING ON ORDER TO SHOW CAUSE AND CASE MANAGEMENT ORDER APPLICATION TO RESCHEDULE HEARING ON ORDER TO SHOW CAUSE AND CASE MANAGEMENT ORDER ARCHIOLOGICAL STORY ARPLICATION TO RESCHEDULE HEARING ON ORDER TO SHOW CAUSE AND CASE MANAGEMENT ORDER ARCHIOLOGICAL STORY ARPLICATION TO RESCHEDULE HEARING ON ORDER TO SHOW CAUSE AND CASE MANAGEMENT ORDER ARCHIOLOGICAL STORY ARCHIOLOGICAL	11) No CV 10 3817 MEI
Petitioners, APPLICATION TO RESCHEDULE	12	UNITED STATES OF AMERICA and) No. CV 10-3818 MEJ
CAUSE AND CASE MANAGEMENT CONFERENCE and [PROPOSED] ORDER TAMARA L. HEFFELFINGER and STEVEN T. HEFFELFINGER, Date: March 31, 2011 Time 10:00 a.m. Place Courtroom B, 15th Floor The United States respectfully requests that this Court reschedule the hearing or the Order to Show Cause and Case Management Conference, currently scheduled for January 27, 2011, at 10:00 a.m., to March 31, 2011, at 10:00 a.m. The parties have tentatively reached a settlement of the issues. Respectfully submitted, MELINDA HAAG United States Attorney Date: January 24, 2011 /s/ Cynthia Stier CYNTHIA STIER Assistant United States Attorney	13) APPLICATION TO RESCHEDULE
TAMARA L. HEFFELFINGER and STEVEN T. HEFFELFINGER, Place Courtroom B, 15th Floor The United States respectfully requests that this Court reschedule the hearing or the Order to Show Cause and Case Management Conference, currently scheduled for January 27, 2011, at 10:00 a.m., to March 31, 2011, at 10:00 a.m. The parties have tentatively reached a settlement of the issues. Respectfully submitted, MELINDA HAAG United States Attorney Date: January 24, 2011 //s/Cynthia Stier CYNTHIA STIER Assistant United States Attorney	14) CAUSE AND CASE MANAGEMENT
STEVEN T. HEFFELFINGER, Respondents. The United States respectfully requests that this Court reschedule the hearing or the Order to Show Cause and Case Management Conference, currently scheduled for January 27, 2011, at 10:00 a.m., to March 31, 2011, at 10:00 a.m. The parties have tentatively reached a settlement of the issues. Respectfully submitted, MELINDA HAAG United States Attorney Date: January 24, 2011 Assistant United States Attorney	15) ORDER
Respondents. Place Courtroom B, 15th Floor The United States respectfully requests that this Court reschedule the hearing or the Order to Show Cause and Case Management Conference, currently scheduled for January 27, 2011, at 10:00 a.m., to March 31, 2011, at 10:00 a.m. The parties have tentatively reached a settlement of the issues. Respectfully submitted, MELINDA HAAG United States Attorney Date: January 24, 2011 /s/ Cynthia Stier CYNTHIA STIER Assistant United States Attorney	16	STEVEN T. HEFFELFINGER,) Date: March 31, 2011
The United States respectfully requests that this Court reschedule the hearing or the Order to Show Cause and Case Management Conference, currently scheduled for January 27, 2011, at 10:00 a.m., to March 31, 2011, at 10:00 a.m. The parties have tentatively reached a settlement of the issues. Respectfully submitted, MELINDA HAAG United States Attorney Date: January 24, 2011 /s/ Cynthia Stier CYNTHIA STIER Assistant United States Attorney	17	
the Order to Show Cause and Case Management Conference, currently scheduled for January 27, 2011, at 10:00 a.m., to March 31, 2011, at 10:00 a.m. The parties have tentatively reached a settlement of the issues. Respectfully submitted, MELINDA HAAG United States Attorney Date: January 24, 2011 /s/ Cynthia Stier CYNTHIA STIER Assistant United States Attorney	18	
January 27, 2011, at 10:00 a.m., to March 31, 2011, at 10:00 a.m. The parties have tentatively reached a settlement of the issues. Respectfully submitted, MELINDA HAAG United States Attorney Date: January 24, 2011 /s/ Cynthia Stier CYNTHIA STIER Assistant United States Attorney	19	The United States respectfully requests that this Court reschedule the hearing on
tentatively reached a settlement of the issues. Respectfully submitted, MELINDA HAAG United States Attorney Date: January 24, 2011 /s/ Cynthia Stier CYNTHIA STIER Assistant United States Attorney	20	the Order to Show Cause and Case Management Conference, currently scheduled for
Respectfully submitted, MELINDA HAAG United States Attorney Date: January 24, 2011 /s/ Cynthia Stier CYNTHIA STIER Assistant United States Attorney	21	January 27, 2011, at 10:00 a.m., to March 31, 2011, at 10:00 a.m. The parties have
Respectfully submitted, MELINDA HAAG United States Attorney Date: January 24, 2011 /s/ Cynthia Stier CYNTHIA STIER Assistant United States Attorney	22	tentatively reached a settlement of the issues.
MELINDA HAAG United States Attorney Date: January 24, 2011 /s/ Cynthia Stier CYNTHIA STIER Assistant United States Attorney	23	Respectfully submitted.
United States Attorney Date: January 24, 2011 Date: January 24, 2011 ZYNTHIA STIER Assistant United States Attorney	24	
Date: January 24, 2011 /s/ Cynthia Stier CYNTHIA STIER Assistant United States Attorney	25	
CYNTHIA STIER Assistant United States Attorney	26	Date: January 24, 2011 /s/ Cynthia Stier
		CYNTHIA STIER Assistant United States Attorney

<u>ORDER</u> Based upon the above Application, and for good cause appearing, the COURT HEREBY ORDERS that the hearing on the Order to Show Cause and Case Management Conference, currently scheduled for January 27, 2011 at 10:00 a.m., is rescheduled to March 31, 2011, at 10:00 a.m. A joint statement shall be filed by March 24, 2011. Dated: January 24, 2011 AMES STATES MAGISTRATE JUDGE Application to Reschedule Hearing on Order to Show Cause and Case

Management Conference and [Proposed] Order